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KEVIN J. HARRINGTON, PARTNER
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August 22, 2024

Via ECF

Hon. Jennifer H. Rearden
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Application GRANTED. This case shall be stayed until January 22, 2025. The parties shall file a joint letter on or before January 8, 2025 updating the Court on the status of the settlement agreement. The Clerk of Court is directed to terminate ECF No. 233. SO ORDERED.

Jennifer H. Rearden
Jennifer H. Rearden, U.S.D.J.
Dated: August 27, 2024

Re: Sydney Hyman v. Andrew Fabbri and Jessica Cohen
Case No. 19-civ. 10506 (JHR)(SLC)

Dear Judge Rearden:

As Your Honor may recall, we represent the Plaintiff Sydney Hyman (“Plaintiff” or “Hyman”), in the above-referenced matter. We submit this joint letter motion along with Murad Michael Khan, Khan Johnson, LLP, counsel for Defendant Andrew Fabbri (“Defendant” or “Fabbri”) in this matter.

The parties fully executed a Settlement Agreement in this matter. Pursuant to the specific terms of the Settlement Agreement, Defendant will be making payments to Plaintiff pursuant to an agreed upon schedule over the next six months, concluding with the last payment due on or before January 22, 2025. The parties jointly request that Your Honor please consent to keep this case open, but stayed, during this six-month period to allow for the Defendant to fully perform his payment obligation under the Settlement

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Agreement. In the unlikely event that any issues develop during such period, the parties believe it is beneficial for all to be able to seek any relief for any breaches of the Settlement Agreement directly with Your Honor. In the event that Defendant fails to make any of the required payments that are due to Plaintiff during this period, a Consent Judgment has been signed by Defendant and included in the Settlement Agreement, which would have to be submitted to Your Honor in the event of an uncured breach, and then So-Ordered. In order to avoid having to file a new action in such a situation, the parties would like to be able to seek any such necessary relief directly from the Court in this matter, however unlikely such a situation may be.

Thank you in advance for your kind consideration and attention to this matter.

Sincerely yours,

HARRINGTON, OCKO & MONK LLP

s/ Kevin J. Harrington

By: Kevin J. Harrington, Esq.

KHAN JOHNSON, LLP

s/ Murad Michael Khan

By: Murad Michael Khan, Esq.

cc: Hon. Sarah L. Cave
United States Magistrate Judge